

1 Michael J. Gearin, WSBA # 20982
David C. Neu, WSBA # 33143
2 Brian T. Peterson, WSBA # 42088
K&L GATES LLP
3 925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
4 (206) 623-7580

Honorable Christopher M. Alston
Chapter 11
Hearing Location: Rm. 7206
Hearing Date: Friday, October 18, 2019
Hearing Time: 9:30 a.m.
Response Date: October 11, 2019

5
6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 In re:

Case No. 16-11767-CMA

11 NORTHWEST TERRITORIAL MINT,
12 LLC,

DECLARATION OF KATHRYN A. ELLIS
IN SUPPORT OF RESPONSE TO PAULA
AND RICHARD PEHL'S OBJECTION TO
MOTION TO APPROVE SETTLEMENT
WITH BRADLEY COHEN AND COHEN
ASSET MANAGEMENT, INC. AND
KATHRYN A. ELLIS AND TO AUTHORIZE
SALE OF SEIZED PROPERTY

13
14
15
16 Kathryn A. Ellis declares as follows:

17 1. I am the Chapter 7 Trustee in case no. 19-41238, United States Bankruptcy Court for
18 the Western District of Washington.

19 2. Mark Calvert, Trustee of Northwest Territorial Mint, LLC, and I have filed motions
20 to approve a settlement with respect to the Seized Property. Since those motions were filed, I have
21 solicited alternative offers for purchase of the Seized Property, from the following entities:

- 22
23
 - Renton Coin Shop Inc.
 - The Gold Center Inc.
 - 24 • Sound Gold Buyers
 - The Coin Market LLC
 - 25 • Redmond Rare Coins
 - 26 • American Rarities Rare Coin Company

DECLARATION OF KATHRYN A. ELLIS - 1

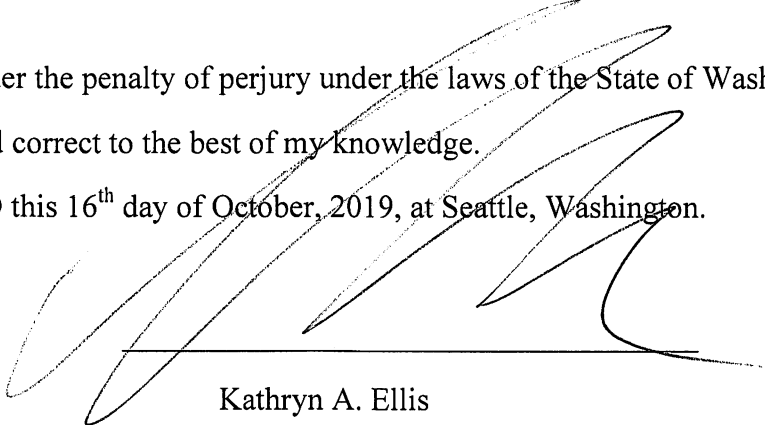
502545721 v1

- Cash for Gold
- Market Coins & Collectibles
- Pacific Iron & Metal
- Seattle Coin Shop
- Coin & Stamp Shop
- LJR Coins
- Tacoma Mall Blvd Coin & Stamp
- Pinnacle Rarities
- B&I Coin Shop
- American Coin & Vault

3. Of these entities, two have indicated a lack of interest, two have submitted competing offers in the amounts of \$130,000.00 and \$135,235.00, subject to inspection. Two entities have made offers, not subject to inspection. American Rarities Rare Coin Company ("ARRCC") offered \$147,500. ARRCC is located in Boulder, Colorado, and has requested two days to pack and remove the items, which I believe can be accommodated from a storage facility nearby. LJR Coins offered \$128,300.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 16th day of October, 2019, at Seattle, Washington.


Kathryn A. Ellis